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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff

11 vs.

12 SHEENA ELKIND,

13 Defendant

Case No.: 2:22-cr-00284-CDS-VCF

14) **STIPULATION TO CONTINUE
15) SENTENCING DATE
15) (FIRST REQUEST)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States
18 Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel
19 for SHEENA ELKIND, that the Sentencing currently scheduled for April 17, 2023 at 10:00
20 p.m., be vacated and set to a date and time convenient to this court but no sooner than
21 sixty (60) days.

22 Pursuant to General Order No. 2007-04, this stipulation is entered and based upon
23 the following:

- 24 1. ELKIND is on pretrial release and does not oppose this continuance.
- 25 2. The parties agree to the continuance.
- 26 3. Defense Counsel needs additional time to confer with ELKIND regarding
27 sentencing matters.
- 28 4. The parties have agreed on this sentencing continuance to allow for
further preparation of arguments expected to be presented to this court at sentencing.

1 5. The parties request a date for sentencing in the first half of June 2023.
2 6. Denial of this request for continuance would deny the defense sufficient time to be
3 able to assist in defendant's sentencing and file a Sentencing Memorandum with the
4 court. This is the first request for a continuance of the sentencing date in this case
5 DATED this 5th day of April 2023.

6 GABRIEL L. GRASSO, P.C.
7 Counsel for SHEENA ELKIND

8 By /s/ Gabriel L. Grasso
9 GABRIEL L. GRASSO, ESQ.

JASON M. FRIERSON
United States Attorney

By /s/ Edward G. Veronda
Assistant United States Attorney

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5 Attorney for ELKIND

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,)
9 Plaintiff) Case No.: 2:22-cr-00284-CDS-VCF
10 vs.)
11 SHEENA ELKIND,) **FINDINGS OF FACT, CONCLUSIONS**
12) **OF LAW AND ORDER**
13 Defendant)
14 _____)

15 **FINDINGS OF FACT**

16 Based on the pending Stipulation of counsel, and good cause appearing therefore,
17 the Court finds that:

18 1. The parties will require additional time to allow for further preparation of
19 arguments expected to be presented to this court at sentencing.
20 2. Defense Counsel needs additional time to confer with ELKIND regarding
21 sentencing matters.
22 3. ELKIND is on pretrial release and does not oppose this continuance.

23
24 **CONCLUSIONS OF LAW**

25 The ends of justice served by granting said continuance outweigh the best interest
26 of the public and the defendant in a speedy trial, since the failure to grant said continuance
27 would be likely to result in a miscarriage of justice, would deny the parties herein sufficient
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1 time and the opportunity within which to be able to effectively resolve this case, taking
2 into account the exercise of due diligence.

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5 **ORDER**

6 IT IS THEREFORE ORDERED that the Sentencing hearing currently scheduled for
7 April 17, 2023, at 10:00 a.m., be vacated and continued to June 15, 2023 at 10:00 a.m.
8 in courtroom 6B.

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DATED this 6th day of April, 2023.

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11 CRISTINA D. SILVA
12 UNITED STATES DISTRICT JUDGE